

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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**PROPOSED ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**DEBTOR'S OMNIBUS RESERVATION OF RIGHTS WITH  
RESPECT TO THE OFFICIAL COMMITTEE OF TALC  
CLAIMANTS' APPLICATIONS TO RETAIN AND EMPLOY PROFESSIONALS**

LTL Management LLC (the “Debtor”) files this omnibus reservation of rights with respect to the applications to retain professionals<sup>2</sup> filed by the Official Committee of Talc Claimants (“TCC”).

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> See *Application for Retention of Professional* [Dkt. 399]; *Application of the Official Committee of Talc Claimants to Retain and Employ Brown Rudnick LLP as Co-Counsel Effective as of April 14, 2023* [Dkt. 400]; *Application for Retention of Professional, Otterbourg P.C., Effective as of April 14, 2023*

To date, it appears that the TCC and its professionals have been acting on behalf of a minority interest rather than the interests of the entirety of the TCC's constituency. Discovery in this chapter 11 case is ongoing. As new information is uncovered, the Debtor expressly reserves all rights, claims, defenses and remedies with respect to any retention of a professional of the TCC, and including without limitation, to seek to modify or vacate orders of retention for any such professionals once the discovery process is complete.

Dated: May 12, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

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[Dkt. 401]; *Application of the Official Committee of Talc Claimants to Retain and Employ Massey & Gail LLP as Special Counsel, Effective as of April 14, 2023* [Dkt. 402].